

AIR EMISSIONS SOURCE CONSTRUCTION PERMIT

Source ID No.: 1490001

Effective Date: DRAFT

Source Name: Westar Energy, Inc., Jeffrey Energy Center

NAICS Code: 221112, Fossil Fuel Electric Power Generation

SIC Code: 4911, Electric Services

Source Location: 25905 Jeffrey Road
St. Mary's, Kansas 66536

Mailing Address: 818 S. Kansas Avenue, P.O. Box 889
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This permit is issued pursuant to K.S.A. 65-3008 as amended.

I. Description of Activity Subject to Air Pollution Control Regulations

Westar Energy, Inc. is proposing to make certain modifications to the existing burner and combustion system on the Unit 1 and 2 boilers at the Jeffrey Energy Center (JEC), located near St. Mary's, Kansas. The Unit 1 modifications include further tuning of existing equipment. The Unit 2 modifications include upgrades to the existing low NO_x burners (LNB) and separated overfire air (SOFA), adjustments to existing SOFA, additional SOFA for deeper staging, low NO_x system tuning and installation of associated equipment. This project will result in an overall decrease in NO_x emissions. As a result of lowering NO_x emissions there may be an increase in carbon monoxide (CO) emissions; with the increase in CO emissions a decrease in carbon dioxide (CO₂) emissions is anticipated.

Emissions of NO_x, CO, and CO₂ were evaluated for this permit review. Due to the increase in CO emissions in excess of the major modification thresholds, the proposed modification will be subject to the requirements of 40 CFR 52.21, Prevention of

Significant Deterioration (PSD) as adopted under K.A.R. 28-19-350. JEC Unit 1 and Unit 2 are affected sources subject to Title IV of the Federal Clean Air Act, Acid Deposition Control. The proposed project does not constitute a modification or reconstruction for the purpose of determining applicability of New Source Performance Standard (NSPS) requirements.

This project is subject to K.A.R. 28-19-300 (Construction permits and approvals; applicability) because the potential-to-emit of CO exceeds 100 tons per year.

An air dispersion modeling impact analysis and a Best Available Control Technology (BACT) determination were conducted as part of the construction permit application process.

II. Significant Applicable Air Regulations

The proposed activity is subject to certain Kansas regulations relating to air pollution control. The following air quality regulations were determined to be applicable to this project:

K.A.R. 28-19-300 Construction permits and approvals; applicability

K.A.R. 28-19-350 Prevention of significant deterioration of air quality

III. Air Emission Unit Technical Specifications

The following equipment or equivalent is approved:

- Unit 1: Further tuning of the existing low NO_x system equipment.
- Unit 2: Upgrades to the existing LNB and SOFA, adjustments to existing SOFA, additional SOFA for deeper staging, low NO_x system tuning and installation of associated equipment.

IV. Air Emissions Estimates from the Proposed Activity

Pollutant Type	Baseline Actual (tons per year)	Projected Actual (tons per year)	Change in Emissions (tons per year)
CO	8,504	23,483	14,979
NO _x	15,118	8,511	-6,607
CO ₂	10,771,528	10,747,993	-23,535

V. Air Emission Limitations

The emission limitations established in this permit apply to JEC Units 1 and 2 at all times, including startup, shutdown and malfunction, except as provided in section "VI. Monitoring, Recordkeeping and Reporting, D. Malfunction" of this permit.

Coal Fired Boilers (JEC Unit 1 and JEC Unit 2)

- A. The thirty (30) day rolling average emission rate of CO shall not exceed 0.40 lb/mmBtu for JEC Unit 1 or JEC Unit 2. This supercedes all previous CO emission limits.
- B. The purpose of the project is to reduce the NO_x emissions from Unit 1 and 2. In the event difficulties are encountered demonstrating compliance with the CO limit while optimizing NO_x emissions, the owner or operator may request a revision to the CO limit. The revision will be subject to KDHE approval and may require a public notice and comment period.
- C. During the 60-day shakedown period¹, CO emissions shall be monitored according to the provisions of the Monitoring, Recordkeeping and Reporting Section of this permit. Excesses which occur during the shakedown period will be reported as part of the semi-annual (or more frequent) reporting, but will not be considered deviations for purposes of the Title V semi-annual monitoring reports or Annual Compliance certification.

VI. Monitoring, Recordkeeping and Reporting

- A. Compliance with the CO BACT limit shall be demonstrated with the continuous emission monitoring system (CEMS) currently installed on the units. The CO CEMS shall be operated, maintained, and quality assured according to 40 CFR Part 60, Appendix B, Performance Specification 4A (PS4A) and 40 CFR Part 60, Appendix F (Quality Assurance/Quality Control).
- B. Reports of excess emissions shall be submitted semi-annually in accordance with the requirements in 40 CFR 60.7(c). The summary report referenced in 40 CFR 60.7(c) and defined in 40 CFR 60.7(d) applies to the CO CEMS downtime only and is not applicable to an exceedance of the CO limit established in the document.
- C. Records shall be kept on site for 2 years in accordance with 40 CFR 60.7(f).
- D. Malfunction:

The Owner or Operator must notify KDHE by telephone, facsimile, or electronic mail transmission within two (2) working days following the discovery of any failure of air pollution control equipment, process equipment, or of the failure of any process to operate in a normal manner which results in an increase in emission above the allowable emission limit stated in section "V. Air Emission Limitations"

¹ 1 The 60-day shakedown period applies to each unit individually. For JEC Unit 1, the shakedown period begins when tuning is initiated and ends 60 days later. For JEC Unit 2, the shakedown period begins when the changes to the low NO_x system are completed and ends 60 days later.

of this permit, a written notification shall be submitted within ten (10) days of the event.

The written notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial malfunction, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed in “Air Emission Limitations,” and the methods utilized to mitigate emissions and restore normal operations. Compliance with this malfunction notification shall not automatically absolve the owner or operator of liability for the excess emissions resulting from such event.

The following criteria will be used by KDHE to evaluate whether emissions from a malfunction are excluded in determining compliance with the emission rate contained herein:

1. The excess emission were caused by a sudden, unavoidable breakdown of technology, beyond the control of the owner or operator;
2. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned for, and could not have been avoided by better operation and maintenance practices;
3. To the maximum extent practicable, the air pollution control equipment or processes were maintained and operated in a manner consistent with good practices for minimizing emissions;
4. Repairs were made in an expeditious fashion when the operator knew or should have known that applicable emission limitations were being exceeded. Off-shift labor and overtime must have been utilized, the extent practicable, to ensure that such repairs were made as expeditiously as practicable.
5. The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;
6. All possible steps were taken to minimize the impact of the excess emissions on ambient air quality;
7. All emission monitoring systems were kept in operation if at all possible;
8. The owner or operator’s actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs, or other relevant evidence;
9. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and
10. The owner or operator properly and promptly notified the appropriate regulatory authority.

VII. Notifications

Notify the Northeast District Office within 30 days after construction is complete so that an evaluation may be conducted.

VIII. General Provisions

- A. This document shall become void if the construction or modification has not commenced within 18 months of the effective date, or if the construction or modification is interrupted for a period of 18 months or longer.
- B. A construction permit or approval must be issued by KDHE prior to commencing any construction or modification of equipment or processes which results in an increase of potential-to-emit equal to or greater than the thresholds specified by K.A.R. 28-19-300.
- C. Upon presentation of credentials and other documents as may be required by law, representatives of KDHE (including authorized contractors of KDHE) shall be allowed to:
 - 1. enter upon the premises where a regulated facility or activity is located or conducted or where records must be kept under conditions of this document;
 - 2. have access to and copy, at reasonable times, any records that must be kept under conditions of this document;
 - 3. inspect at reasonable times, any facilities, equipment (including monitoring and control equipment) practices or operations regulated or required under this document; and
 - 4. sample or monitor, at reasonable times, for the purposes of assuring compliance with this document or as otherwise authorized by the Secretary of KDHE, any substances or parameters at any location.
- D. The emission unit or stationary source which is the subject of this document shall be operated in compliance with all applicable requirements of the Kansas Air Quality Act and the Federal Clean Air Act.
- E. This document is subject to periodic review and amendment as deemed necessary to fulfill the intent and purpose of the Kansas Air Quality Statutes and Regulations.
- F. This document does not relieve the facility of the obligation to obtain any approvals, permits, licenses or documents of sanction which may be required by other federal, state or local government agencies.

Permit Engineer

Rick Bolfing, P.E.
Environmental Engineer
Bureau of Air and Radiation
Air Compliance and Enforcement Section

Date Signed

RJB:

c: C-11157
Pat Simpson, NEDO